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May 30, 1996

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W. -- Room 222
Washington, DC 20554

Re: Ex Parte CC Docket No. 95-116 - Telephone Number Portability

Dear Mr. Caton:

Today I met with M. Littell of the Common Carrier Bureau's Policy and Planning Division. The material attached was used to discuss AT&T's proposed local number portability implementation schedule and the relative impact on switch real time capacity for both the LRN and QQR solutions.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Sincerely,

cc: Ms. M. Littell

Attachment

Telephone Number Portability
CC Docket No. 95-116

LRN Implementation Schedule

• The proposed implementation schedule presumes major switch manufacturers can update switch software at a rate of 53 switches per week.

4 MSAs per Region per Quarter	x	7 Regions	=	28 MSAs per Quarter
28 MSAs per Quarter	x	25 switches per MSA	=	700 switches per quarter
700 switches per Quarter	÷	13 weeks per Quarter	=	53 switches per week

• The record in this proceeding indicates one major switch manufacturer alone can update 50 switches per week.*

* See Letter to Jennie Su, Policy & Program Planning Division, Common Carrier Bureau, Federal Communications Commission from Carol Wilner, Director-Federal Public Affairs, Lucent Technologies, dated May 20, 1996.

Telephone Number Portability
CC Docket No. 95-116

LRN Implementation Schedule

105 MSAs by the third quarter 1998

Regional LRN Deployment

In each MSA, deployment would include 25 switches: 20 ILEC and 5 CLEC

2Q96	3Q96	4Q96	1Q97	2Q97	3Q97	4Q97	1Q98	2Q98	3Q98
					1	3	3	4	4

Total: 15 MSAs per region x 7 regions = 105 MSAs deployed by 3Q98

Service Management System ("SMS") Installation

2Q96	3Q96	4Q96	1Q97	2Q97	3Q97
review state RFPs	Issue Nat'l RFP & select vendor	develop req'ts	← Build SMS →		Test SMS

LRN vs. QOR: Switch Usage Efficiency

Data

		Real Time Switch Usage	
Call Method	Type of Call	Lucent	Siemens
LRN	Call to Ported Number	1.30	1.34
	Call to Non-Ported Number	1.15	1.34
QOR	Call to Ported Number	2.10	2.34
	Call to Non-Ported Number	1.04	1.04

Source: Letter from Al Loots, Lucent Technologies, to Jerry Abercrombie, Woody Traylor, and Patricia L. vanMidde, dated May 20, 1996, and Letter from Terry Jennings, Siemens Stromberg-Carlson, to California Local Number Portability Co-Chairs dated May 22, 1996.

Assumption

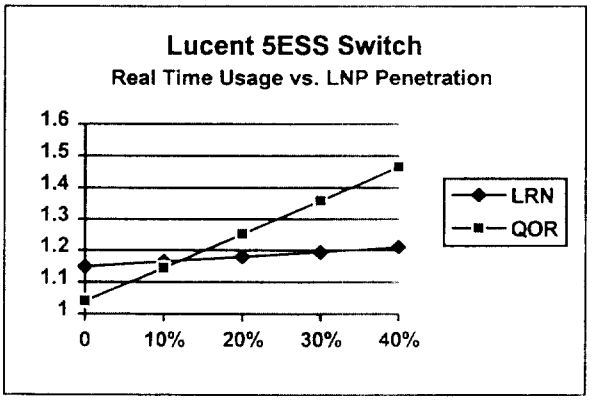
No intermediate (tandem) switches, i.e., direct trunking between originating and donor switches for QOR: This favors QOR since the QOR switch usage of intermediate (tandem) switches is neglected.

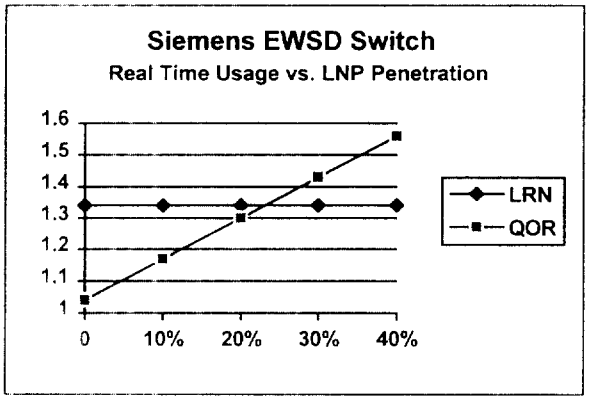
Calculations

Assume P = % of the Numbers that are Ported; (100-P) = % of the Numbers that are not Ported

Lucent	Siemens
LRN QOR	LRN QOR
1.30P + 1.15(100-P) = 2.10P + 1.04(100-P)	1.34P + 1.34(100-P) = 2.34P + 1.04(100-P)
P = 12%	P = 23%

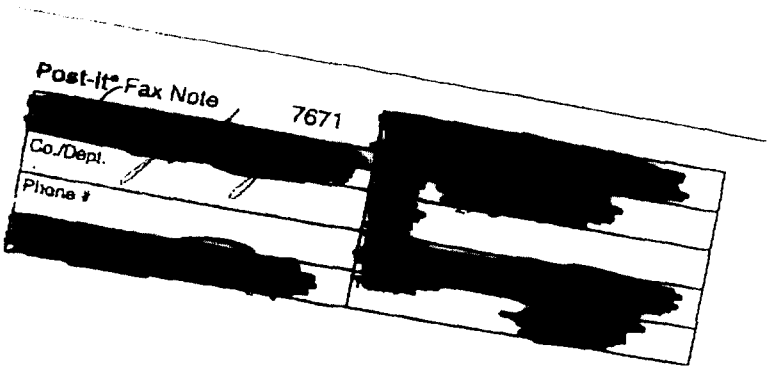
Results





The crossover points for the Lucent and Siemens switches are at LNP penetrations of 12% and 23%, respectively. Since intermediate switches were neglected, actual crossover points are lower. Above these points, LRN is more efficient than QOR.

SIEMENS
Stromberg-Carlson



May 22, 1996

California Local Number Portability Task Force
Task Force Co-Chairs
Ms. Patricia vanMidde - AT&T
Mr. Jerry Abercrombie - Pacific Bell
Mr. Woody Traylor - MCImetro

Dear Ms. vanMidde and Messrs. Abercrombie and Traylor,

This letter is in response to the California LNP Task Force's request for information on the relative costs of the two alternative proposals (LRN and LRN/QOR) being considered for implementation of LNP in California, and the availability of these capabilities in the EWSD switch.

Price Quote, per Switch

While Siemens Stromberg-Carlson understands the need for this information to compare the relative costs of LRN and QOR, we have two basic concerns in meeting your request:

1) Pricing information, whether list or actual, is closely held proprietary information. We understand that the information provided in this response will become part of the public record. For this reason, we must decline your request. However, Siemens Stromberg-Carlson understands the importance of these proceedings and is willing to cooperate if some mechanism to protect our proprietary information can be developed. This also holds true for any comparative pricing between LRN and QOR.
2) Even if "list" prices were provided by the switching vendors, the actual cost to local service providers could vary by a wide margin based on the discount levels applied by each switching vendor to each local service provider. This could be misleading, and would not result in a true comparison.

Siemens Stromberg-Carlson

900 Broken Sound Parkway Boca Raton, Florida 33487 (407) 955-5000

Software Availability and Generic Release Dates, per Switch Type

Barring any unforeseen circumstances, both the LRN and QOR features will be available on the EWSD switch in our Release 14.E generic, which will be available for FOA testing in October, 1996, and will be generally available in 1Q97.

Switch Real Time and Memory Impacts

The baseline call is a call from a residential line to a residential line. The real time impact is shown as a percentage over what is required for the baseline call. Without further provisions for the assumptions of the economic factors to be considered, the "Cost per call" cannot be determined.

Switch Real Time Assessment

Baseline (pre-portability environment)	1
LRN call to non-ported number	1.34
LRN call to ported number	1.34
QOR call to non-ported number	1.04
QOR call to ported number	2.34

Patents, Licensing and/ Copyrights

No patents have been filed by Siemens Stromberg-Carlson on the basic LRN or QOR capabilities.

Upon review of our responses, feel free to contact me on 407-955-6596 should there be any further questions.

Sincerely,

Terry Jennings
Senior Product Manager

Lucent Technologies
Bell Labs Innovations

May 20, 1996

Re: 5/8/96 Information Request for LRN and QoR

Jerry Abercrombie
Task Force Co-Chair
Pacific Bell

Woody Traylor
Task Force Co-Chair
MCImetro

Patricia L. vanMidde
Task Force Co-Chair
AT&T

Jerry,
Woody,
Pat,

This letter provides a response for the information requested in your attached letter dated May 8,1996.

Price Quote, per Switch

Lucent Technologies does not currently sell or price the LRN software on a per switch basis. We have provided our customers with network buyout prices and they are considered proprietary. Our pricing for QoR has been on a network buyout basis and is also considered proprietary. We will continue to provide prices to potential customers under an appropriate non-disclosure agreement.

Software Availability and Generic Release Dates, per Switch Type

We have been participating in industry efforts to define QoR requirements and have offers pending to requesting customers. For your planning purposes, the earliest availability would be 18 months from the time final requirements and business arrangements are completed with interested customers. Consequentially, we can not comment on any specific plans at this time.

Switch Real Time and Memory Impacts

The following information summarizes real time estimates. Given the preliminary nature of these estimates we reserve the right to change them at any time.

Responses 1-4 provides ratios that are for originating switch real time for an originating office perspective. Response 5-7 are donor switch real time ratios. All ratios are for SM real time utilization.

1. For an originating local interoffice call attempt to a ported number with an LNP query at the originating switch, but no QOR, the estimated real time ratio is 1.30:1.

2. For an originating local interoffice call attempt to a non-ported number with an LNP query at the originating switch, but no QOR, the estimated real time is 1.15:1.

Post-it® Fax Note 7671 [redacted]

[redacted]

3. For an originating local interoffice call attempt to a ported number with a QOR routing attempt and subsequent LNP query, the estimated real time ratio is in the range of 1.7:1. Of this ratio, 40% is estimated to be due to the LNP query and response and 60% is estimated to be due to the QOR specific switch processing.

4. For an originating local interoffice call attempt to a non-ported number with QOR routing and no subsequent LNP query, the estimated ratio is in the range of 1.03:1.

5. For a terminating call attempt to a number that has ported elsewhere with no QOR processing invoked, but with an LNP query from the donor switch, the estimated ratio (relative to benchmark donor real time) is 1.35:1.

6. For a terminating call attempt to a number that has ported elsewhere with QOR processing invoked and therefore no LNP query from the donor switch, the estimated ratio (relative to benchmark donor real time) is 0.40:1.

7. For a terminating call attempt to a non-ported number with QOR processing invoked (the number still resides on the donor switch) the estimated ratio (relative to benchmark donor real time) is in the range of 1.01:1. Note that this assumes there is a QOR trigger set for the associated NPA-NXX which is needed to deal with the line originations and incoming calls which do not have the QOR indicator set.

Patents, Licensing and/or Copyrights

Lucent Technologies holds numerous patents and cannot specify impact at this time.

Please direct any additional questions regarding this matter to me at 708-224-6160.

Al Loots

Al Loots
Lucent Technologies